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HEARING DATE AND TIME: October 27, 2011 at 10:00 a.m. (Eastern Time) RESPONSE DEADLINE: October 13, 2011 at 4:00 p.m. (Eastern Time)

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF DEBTORS' TWO HUNDRED FIFTH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).

IF YOU HAVE QUESTIONS, PLEASE CONTACT DEBTORS' COUNSEL, ERIKA DEL NIDO, AT (212) 310-8323.

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

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Robert J. Lemons

Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

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LEHMAN BROTHERS HOLDINGS INC., et al. : 08-13555 (JMP)

:

Debtors. : (Jointly Administered)

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NOTICE OF HEARING ON DEBTORS' TWO HUNDRED FIFTH OMNIBUS OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION)

PLEASE TAKE NOTICE that on September 14, 2011, Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), filed their two hundred fifth omnibus objection to claims (the "Debtors' Two Hundred Fifth Omnibus Objection to Claims"), and that a hearing (the "Hearing") to consider the Debtors' Two Hundred Fifth Omnibus Objection to Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in

Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **October 27, 2011, at 10:00 a.m.** (Eastern Time), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to the Debtors' Two Hundred Fifth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert J. Lemons, Esq. and Mark Bernstein, Esq.); (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta G. Gasparini, Esq. and Andrea B. Schwartz, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.); so as to be so filed and received by no later than October 13, 2011 at 4:00 p.m. (Eastern Time) (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and

served with respect to the Debtors' Two Hundred Fifth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Debtors' Two Hundred Fifth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: September 14, 2011 New York, New York

/s/ Robert J. Lemons

Robert J. Lemons WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000

Attorneys for Debtors

Facsimile: (212) 310-8007

Attorneys for Debtors and Debtors in Possession

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HEARING DATE AND TIME: October 27, 2011 at 10:00 a.m. (Eastern Time) RESPONSE DEADLINE: October 13, 2011 at 4:00 p.m. (Eastern Time)

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Robert J. Lemons

Attorneys for Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al. : 08-13555 (JMP)

Debtors. : (Jointly Administered)

-----X

DEBTORS' TWO HUNDRED FIFTH OMNIBUS OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION)

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF DEBTORS' TWO HUNDRED FIFTH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).

IF YOU HAVE QUESTIONS, PLEASE CONTACT DEBTORS' COUNSEL, ERIKA DEL NIDO, AT (212) 310-8323.

TO THE HONORABLE JAMES M. PECK UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. ("<u>LBHI</u>") and its affiliated debtors, in the abovereferenced chapter 11 cases, as debtors and debtors in possession (collectively, the "<u>Debtors</u>"), respectfully represent:

Relief Requested

- 1. The Debtors file this two hundred fifth omnibus objection to claims (the "Two Hundred Fifth Omnibus Objection to Claims"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and this Court's order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the "Procedures Order") [Docket No. 6664], seeking disallowance and expungement of the claims listed on Exhibit A annexed hereto.
- 2. The Debtors have examined the proofs of claim identified on Exhibit A (collectively, the "Insufficient Documentation Claims") and have determined that the Insufficient Documentation Claims violate this Court's July 2, 2009 order setting forth the procedures and deadlines for filing proofs of claim in these chapter 11 cases (the "Bar Date Order") [Docket No. 4271], as they were submitted with insufficient documentation and no explanation as to why such documentation was unavailable. The Debtors requested that the holders of the Insufficient Documentation Claims provide additional documentation and warned that a failure to provide additional information would likely result in an objection to the No Liability Claims. However, the holders of the No Liability Claims did not provide the Debtors with any additional information. The Insufficient Documentation Claims do not constitute valid *prima facie* claims, and the Debtors request they be disallowed and expunged in their entirety.

3. The Debtors reserve all their rights to object on any basis to any Insufficient Documentation Claim as to which the Court does not grant the relief requested herein.

Jurisdiction

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

- 5. Commencing on September 15, 2008, and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
- 6. On September 17, 2008, the United States Trustee for Region 2 (the "<u>U.S.</u> <u>Trustee</u>") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "<u>Creditors' Committee</u>").
- 7. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as Examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee's appointment of the Examiner. The Examiner has filed his report pursuant to section 1106(b) of the Bankruptcy Code [Docket No. 7531].
- 8. On July 2, 2009, this Court entered the Bar Date Order, which requires, among other things, that "each Proof of Claim must: . . . (vi) include supporting documentation or an explanation as to why documentation is not available." (Bar Date Order at 6.) The

supporting documentation requirement was specifically set forth on the face of the Courtapproved proof of claim form. (*Id.*) Furthermore, the Bar Date Order provides that "any holder of a claim against the Debtors who is required, but fails to file a proof of such claim in accordance with the Bar Date Order on or before the Bar Date . . . specifying the applicable Debtor and other requirements set forth herein, shall forever be barred, estopped, and enjoined from asserting such claim against the Debtors (or filing a Proof of Claim with respect thereto)." (*Id.* at 9-10.) A copy of the Bar Date Order was made publicly available at http://www.lehman-docket.com.

- 9. Claimants also received notice of the Bar Date Order by mail. (*See* Notice of Deadlines for Filing Proofs of Claim (the "Bar Date Notice").) In the Bar Date Notice, which also was published in <u>The New York Times</u> (International Edition), <u>The Wall Street Journal</u> (International Edition), and <u>The Financial Times</u>, claimants were specifically instructed that "[i]f you file a Proof of Claim, your filed Proof of Claim must: . . . (vi) include supporting documentation or an explanation as to why documentation is not available." (Bar Date Notice at 4.)
- 10. Claimants who filed a proof of claim prior to entry of the Bar Date Order were instructed that they need not file a new claim if their proof of claim substantially conformed to the Court-approved proof of claim form, which form clearly set forth the requirement that claimants provide supporting documentation with their claim form or an explanation as to why such documentation is unavailable. (*Id.* at 2.)¹ The Bar Date Notice also prominently stated in bold-face type that "any creditor who fails to file a Proof of Claim in accordance with the Bar Date Order on or before the Bar Date . . . specifying the applicable Debtor and other

¹ The Bankruptcy Rule's Official Form 10, the standardized proof of claim form, also requires claimants to attach supporting documentation or explain why said documentation is not available.

requirements set forth in the Bar Date Order, for any claim such creditor holds or wishes to assert against the Debtors, will be forever barred, estopped, and enjoined from asserting such claim (and from filing a Proof of Claim with respect to such claim)." (*Id.* at 6 (emphasis in original).)

11. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

The Insufficient Documentation Claims Should Be Disallowed and Expunged

- 12. In reviewing the claims filed on the claims register in these cases and maintained by the Court-appointed claims agent, the Debtors have identified the claims on Exhibit A as claims that should be disallowed and expunged on the basis that they do not include any supporting documentation or an explanation as to why such documentation is unavailable and, therefore, do not constitute valid *prima facie* claims.
- 13. A filed proof of claim is "deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). If an objection refuting at least one of the claim's essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc'ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).
- 14. The Bar Date Order specifically requires that "each Proof of Claim *must*:

 . . . (vi) include supporting documentation or an explanation as to why documentation is not available." (Bar Date Order at 6 (emphasis added).) This requirement for proofs of claim is not a unique one. Indeed, this Court and others in the Southern District of New York have entered

similar orders requiring that proofs of claim include supporting documentation or an explanation as to why documentation is unavailable. (*See* Oct. 20, 2009 Order [Dkt. No. 316] at 6, *In re Finlay Enterprises, Inc.*, No. 09-14873 (JMP) (Peck, J.); *see also* Oct. 14, 2009 Order at 2-3, *In re AGT Crunch Acquisition LLC, et al.*, No. 09-12889 (REG) (Gerber, J.).) The Bankruptcy Rules' official proof of claim form also includes this standard requirement. However, the Insufficient Documentation Claims did not include any supporting documentation or an explanation as to the unavailability of documentation.

- supporting documentation requirement via the Bar Date Notice. The Bar Date Notice included instructions on how to complete the proof of claim forms and a warning that failure to comply with those instructions would result in claims being barred. (*See* Bar Date Notice at 4, 6.) Claimants were also notified that they needed to submit new proofs of claim if their claims submitted prior to the Bar Date Order did not substantially conform to the Court-approved proof of claim form, which clearly set forth the supporting documentation requirement. (*See id.* at 2.) Nevertheless, the Insufficient Documentation Claims were submitted without the required supporting documentation or an explanation as to why such documentation is unavailable.
- 16. Prior to filing this Two Hundred Fifth Omnibus Objection to Claims, the Debtors requested that the holders of the Insufficient Documentation Claims provide additional documentation and warned that a failure to do so likely would result in an objection to the claims, however, no additional documentation was provided by the claimants.
- 17. Without additional information regarding the Insufficient Documentation Claims, the Debtors are unable to evaluate the merits and validity of the Insufficient Documentation Claims. Nothing in the Debtors' books and records provides any information

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regarding the Insufficient Documentation Claims. Because the Insufficient Documentation

Claims fail to comply with the Bar Date Order's specific direction that claims include supporting

documentation or an explanation as to why such documentation is unavailable, and, therefore, do

not constitute valid *prima facie* claims, the Debtors request that the Court disallow and expunge

in their entirety the Insufficient Documentation Claims listed on Exhibit A.

Notice

18. No trustee has been appointed in these chapter 11 cases. The Debtors

have served notice of this Two Hundred Fifth Omnibus Objection to Claims on (i) the U.S.

Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange

Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern

District of New York; (vi) each claimant listed on Exhibit A; and (vii) all other parties entitled to

notice in accordance with the procedures set forth in the second amended order entered on

June 17, 2010 governing case management and administrative procedures for these cases

[Docket No. 9635]. The Debtors submit that no other or further notice need be provided.

19. No previous request for the relief sought herein has been made by the

Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request that the Court grant the relief

requested herein and such other and further relief as is just.

Dated: September 14, 2011

New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

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EXHIBIT A

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NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM#	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1 ABNEY, LYNDA 721 EAST 104TH STREET CHICAGO, IL 60628		Lehman No Case Asserted/All Cases Asserted	09/22/2009	32092	\$1,959.00	Insufficient Documentation Claim
2 ANDREWS, TESSA 11 CROMLIX CLOSE CHISLEHURST KENT, BR7 5SJ UNITED KINGDOM		Lehman No Case Asserted/All Cases Asserted	09/15/2009	12973	\$5,672.00	Insufficient Documentation Claim
3 BKK FUR HEILBERUFE SCHIESS STRASSE 43 DUSSELDOLF, 40549 GERMANY		Lehman No Case Asserted/All Cases Asserted	07/06/2009	5141	\$1,148.92	Insufficient Documentation Claim
4 BLAIR, MARC H. 330 WEST 72ND STREET APARTMENT 4A NEW YORK, NY 10023	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/22/2009	5854	\$200,000.00	Insufficient Documentation Claim
5 BOK, CATHLEEN 225 E 85TH ST NEW YORK, NY 10028		Lehman No Case Asserted/All Cases Asserted	09/22/2009	30037	\$65,045.00	Insufficient Documentation Claim
6 BOYCHUK, THOMAS JOHN 8 DRIFTWOOD DR. PARLIN, NJ 08859	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30410	\$2,680.00	Insufficient Documentation Claim
7 BRACIAK, BASMA 3252 42ND STREET ASTORIA, NY 11103	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27377	Undetermined	Insufficient Documentation Claim
8 BROGAN, JAMES C. 27 HIGHLAND ROAD GLEN ROCK, NJ 07452	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28668	\$91,338.00	Insufficient Documentation Claim
9 BROWNSTEIN, KIMBERLY 201 EAST 69TH STREET APT 11X NEW YORK, NY 10021		Lehman No Case Asserted/All Cases Asserted	09/22/2009	27399	\$5,000.00	Insufficient Documentation Claim

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
10	CANTELLO, PAUL 37 SYLVESTRE AVENUE HAWTHORNE, NJ 07506	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/09/2009	10960	Undetermined	Insufficient Documentation Claim
11	CANTELLO, PAUL 37 SYLVESTER AVENUE HAWTHORNE, NJ 07506	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/09/2009	10962	Undetermined	Insufficient Documentation Claim
12	CHENG, HELEN 2220 63RD ST. BROOKLYN, NY 11204	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27383	Undetermined	Insufficient Documentation Claim
13	CHENG,ELISA CHING C FLAT C, 50TH FLOOR, TOWER 12 CARMEL COVE, CARIBBEAN COAST 1 MAN TUNG ROAD TUNG CHUNG, HONG KONG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/23/2009	5982	Undetermined	Insufficient Documentation Claim
14	CHOY, MAY B. 6021 SOUTHPARK MORTON GROVE, IL 60053		Lehman No Case Asserted/All Cases Asserted	09/03/2009	10253	\$25,000.00	Insufficient Documentation Claim
15	COOK, DAVID 346 HAVERHILL STREET NORTH READING, MA 01864		Lehman No Case Asserted/All Cases Asserted	09/22/2009	27340	\$188,879.00	Insufficient Documentation Claim
16	CORNEJO, EMIL 420 EAST 58TH STREET NEW YORK, NY 10022		Lehman No Case Asserted/All Cases Asserted	09/21/2009	25457	Undetermined	Insufficient Documentation Claim
17	CRADER, MELANIE A. 3 MARIN COURT MANHATTAN BEACH, CA 90266	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32769	\$35,950.00	Insufficient Documentation Claim
18	CRUIKSHANK, DOUGLAS A. 376 NEW ROCHELLE RD BRONXVILLE, NY 10708		Lehman No Case Asserted/All Cases Asserted	09/18/2009	19368	\$2,972,782.00	Insufficient Documentation Claim

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
19	CURTIS, JENNIFER M. 2112 SUNSET AVE #2 UTICA, NY 13502-5519		Lehman No Case Asserted/All Cases Asserted	09/18/2009	18821	\$4,775.00	Insufficient Documentation Claim
20	DAVIS, KIERAN 2 BISHOPSTHORPE RD LONDON, SE26 4NY UNITED KINGDOM		Lehman No Case Asserted/All Cases Asserted	09/18/2009	18781	\$102,019.00	Insufficient Documentation Claim
21	DELEO, RUTH R. 86-23 89TH ST WOODHAVEN, NY 11421		Lehman No Case Asserted/All Cases Asserted	09/16/2009	13566	\$2,199.00	Insufficient Documentation Claim
22	DUFF, TERE 197 OLD CENTER GROVE ROAD RANDOLPH, NJ 07869		Lehman No Case Asserted/All Cases Asserted	09/22/2009	27722	\$32,532.00	Insufficient Documentation Claim
23	DUFFY, BRIDGET 86 W 12TH ST APT 1C NEW YORK, NY 10011-8682		Lehman No Case Asserted/All Cases Asserted	09/22/2009	34268	\$10,950.00	Insufficient Documentation Claim
24	DUNN, JOHN J. 232 PARK AVE HUNTINGTON, NY 11743-2703	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17764	Undetermined	Insufficient Documentation Claim
25	EKEN, ONUR 1 COLUMBUS PL APT N43D NEW YORK, NY 10019-8235	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27375	Undetermined	Insufficient Documentation Claim
26	GOING, KENNETH JR 620 BREAD AND CHEESE HOLLOW RD NORTHPORT, NY 11768		Lehman No Case Asserted/All Cases Asserted	09/22/2009	32515	\$22,212.00	Insufficient Documentation Claim
27	GORMAN, LESLIE D. 305 EAST 63RD STREET APT 17-B NEW YORK, NY 10065	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/15/2009	12729	\$500,000.00*	Insufficient Documentation Claim
28	GREENE, AMY H. 3524 BREMEN ST DALLAS, TX 75206-5702		Lehman No Case Asserted/All Cases Asserted	09/21/2009	19800	Undetermined	Insufficient Documentation Claim

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
29	HANSEN, KERRIE 77-05 86 STREET GLENDALE, NY 11385		Lehman No Case Asserted/All Cases Asserted	09/22/2009	27708	\$2,835.00	Insufficient Documentation Claim
30	HEALY, KRISTIN 176 BROADWAY # 15F NEW YORK, NY 10038	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27381	Undetermined	Insufficient Documentation Claim
31	HERRMANN, DAVID L. 804 MAPLE GLEN LANE WAYNE, PA 19087	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	33213	Undetermined	Insufficient Documentation Claim
32	HOULIHAN, BRENNA A. 546 LOCUST ST MOUNT VERNON, NY 10552-2607		Lehman No Case Asserted/All Cases Asserted	09/21/2009	25116	Undetermined	Insufficient Documentation Claim
33	JONES, BRIAN 605 THIRD AVENUE, 39TH FLOOR NEW YORK, NY 10158	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28385	\$66,322.93	Insufficient Documentation Claim
34	KATZ, BENJAMIN 114 EAST 1ST STREET APT. 17 NEW YORK, NY 10009		Lehman No Case Asserted/All Cases Asserted	09/21/2009	25486	\$4,000.00	Insufficient Documentation Claim
35	KENNELLY, FIONA 5 LAIRD AVENUE GRAYS, ESSEX, RM16 2NL UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	15718	\$2,000.00	Insufficient Documentation Claim
36	KNAPP, RONALD 8785 N AWL RD PARKER, CO 80138		Lehman No Case Asserted/All Cases Asserted	09/16/2009	13995	Undetermined	Insufficient Documentation Claim
37	LATESSA, LINNAE 7 CLUB LANE ELMSFORD, NY 10523		Lehman No Case Asserted/All Cases Asserted	09/22/2009	32436	\$86,684.77	Insufficient Documentation Claim
38	LEUNG, PHILIP I 20 CONFUCIUS PLAZA APT. 40G NEW YORK, NY 10002	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27557	\$16,000.00	Insufficient Documentation Claim

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
39	LIANG, MANDY 32 JACKSON ST. # 3E NEW YORK, NY 10002	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27378	Undetermined	Insufficient Documentation Claim
40	LUNNIE, CHRISTOPHER 26 POPLAR AVENUE BRONX, NY 10465		Lehman No Case Asserted/All Cases Asserted	09/22/2009	28387	Undetermined	Insufficient Documentation Claim
41	MARSAN, DEAN K 253-11 BRATTLE AVENUE LITTLE NECK, NY 11362	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/14/2009	12164	Undetermined	Insufficient Documentation Claim
42	MATTESICH, VICTORIA 60 NORTHGATE PARK RINGWOOD, NJ 07456		Lehman No Case Asserted/All Cases Asserted	09/22/2009	28390	Undetermined	Insufficient Documentation Claim
43	MORSE, DAVID H. 6 CHESTNUT AVENUE BRONXVILLE, NY 10708		Lehman No Case Asserted/All Cases Asserted	09/21/2009	25143	Undetermined	Insufficient Documentation Claim
44	MURPHY, GEORGE 80 WOODLAND AVE SUMMIT, NJ 07901	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27382	Undetermined	Insufficient Documentation Claim
45	MURPHY, PAT 71 HAYES STREET GARDEN CITY, NY 11530	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17258	\$45,000.00	Insufficient Documentation Claim
46	MYERS-HENRY, KAREN 102 BARTHOLDI AVE JERSEY CITY, NJ 07305		Lehman No Case Asserted/All Cases Asserted	09/22/2009	27721	\$3,774.00	Insufficient Documentation Claim
47	PRUSINSKI, THOMAS 72 CANTERBURY GATE LYNBROOK, NY 11563	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	33575	\$10,000.00	Insufficient Documentation Claim
48	RAHAVY, SEAN 171 THOMPSON ST #19 NEW YORK, NY 10012	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/31/2009	6836	\$10,000.00*	Insufficient Documentation Claim

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
49	RAIMONDI, RAYMOND R., JR 301 EAST 79, 7J NEW YORK, NY 10075	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27376	Undetermined	Insufficient Documentation Claim
50	REES, MATTHEW D. 155 PRINCE STREET, APT. 2 NEW YORK, NY 10012		Lehman No Case Asserted/All Cases Asserted	09/21/2009	25148	Undetermined	Insufficient Documentation Claim
51	REILLY, FLINT 98 INDIAN HILL ROAD WINNETKA, IL 60093		Lehman No Case Asserted/All Cases Asserted	07/20/2009	5598	\$3,600.00	Insufficient Documentation Claim
52	RONCAGLIOLO, JACQUELINE S. 454 RIVER ROAD APARTMENT G NUTLEY, NJ 07110	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/14/2009	5327	Undetermined	Insufficient Documentation Claim
53	ROSENBERG, ADAM S. 4 HILLVIEW CIRCLE HOCKESSIN, DE 19707	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	33212	Undetermined	Insufficient Documentation Claim
54	ROWLEY, BETH L 65 RIDGEFIELD ROAD WILTON, CT 06897-3006		Lehman No Case Asserted/All Cases Asserted	09/22/2009	29463	Undetermined	Insufficient Documentation Claim
55	RYAN, MAUREEN 96 COLONIAL STREET EAST NORTHPORT, NY 11731		Lehman No Case Asserted/All Cases Asserted	09/22/2009	31175	\$10,950.00	Insufficient Documentation Claim
56	SABIA, DZINTRA I. 43 MAIN STREET FARMINGDALE, NY 11735	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19198	Undetermined	Insufficient Documentation Claim
57	SAVIO, VICTORIA E. 12 MCKESSON HILL RD. CHAPPAQUA, NY 10514		Lehman No Case Asserted/All Cases Asserted	09/17/2009	15702	\$4,000.00	Insufficient Documentation Claim
58	SCLAFANI, JOSEPH 4705 CENTER BLVD APT 1411 LONG IS CITY, NY 11109-5679		Lehman No Case Asserted/All Cases Asserted	09/22/2009	30367	\$450,000.00	Insufficient Documentation Claim

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
59	SCOTLAND, PAULA AKA PAPP, PAULA 420 ARLENE MARIE LN GARDNERVILLE, NV 89460-6567	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18948	Undetermined	Insufficient Documentation Claim
60	SHANNON, WILLIAM E 711 BIRCHWOOD DRIVE WESTBURY, NY 11590		Lehman No Case Asserted/All Cases Asserted	09/22/2009	30036	\$606,000.00	Insufficient Documentation Claim
61	SHEA, DEBORAH 615 EAST 14TH STREET APT. 10F NEW YORK, NY 10009	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/09/2009	10959	Undetermined	Insufficient Documentation Claim
62	SINGER, JOSEPH P P.O. BOX 140498 STATEN ISLAND, NY 10314		Lehman No Case Asserted/All Cases Asserted	08/18/2009	8638	\$14,000.00	Insufficient Documentation Claim
63	SMEJKAL, FRANK 1305 BEVERLY STREET HOUSTON, TX 77008	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/23/2009	34673	\$250,000.00	Insufficient Documentation Claim
64	SOMERVILLE, LAURA 25 BANK STREET LONDON, E14 SLS UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25643	\$21,401.62	Insufficient Documentation Claim
65	SOMERVILLE, ROBEN L. 107 CLARK STREET GLEN RIDGE, NJ 07028	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/20/2009	5727	Undetermined	Insufficient Documentation Claim
66	STANCIU, ELENA 10 CAXTON STREET FLAT 7 LONDON, SW1H 0AQ UNITED KINGDOM		Lehman No Case Asserted/All Cases Asserted	09/21/2009	22913	\$2,000.00	Insufficient Documentation Claim
67	TANAKA, TRACY C. 30 HILLSIDE AVE CEDAR GROVE, NJ 07009-1415		Lehman No Case Asserted/All Cases Asserted	09/22/2009	27353	\$5,000.00	Insufficient Documentation Claim

^{* -} Indicates claim contains unliquidated and/or undetermined amounts

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	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
68	TASSAN, LUCA 28 NEW ATLAS WHARF 3 ARNHEM PLACE LONDON, E14 3SS UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/08/2009	10812	\$700,000.00	Insufficient Documentation Claim
69	TILSON, SUSAN N 172 EDINBURGH CT MATAWAN, NJ 07747-1868		Lehman No Case Asserted/All Cases Asserted	09/22/2009	28284	Undetermined	Insufficient Documentation Claim
70	TIOMKIN, TAMARA 205 E 78TH STREET APT 12B NEW YORK, NY 10075	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30362	\$5,000.00	Insufficient Documentation Claim
71	TRANCHINA, ERNEST V 235 BARLOW AVE STATEN ISLAND, NY 10308-1510		Lehman No Case Asserted/All Cases Asserted	07/13/2009	5291	\$338.70*	Insufficient Documentation Claim
72	VALENTI, ROSEMARY 7752 76TH STREET GLENDALE, NY 11385	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28653	Undetermined	Insufficient Documentation Claim
73	VASQUEZ, JUAN 76 VESEY ST NEWARK, NJ 07105-1023	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/01/2009	100231	\$18,000.00	Insufficient Documentation Claim
74	WASHINGTON, JANET T. 151-47 136 AVENUE JAMAICA, NY 11434	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18922	\$4,000.00	Insufficient Documentation Claim
75	WEINSTEIN, DANA 330 WEST 72ND ST. 13C NEW YORK, NY 10023	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27380	Undetermined	Insufficient Documentation Claim

¹ Claim number 10023 is also included on Debtors' One Hundred Eighty-Sixth Omnibus Objection to Claims (Misclassified Claims).

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NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
76 ZUCCONI, LAWRENCE 65 CORSO ITALIA UNIT B FREEHOLD, NJ 07728-9469		Lehman No Case Asserted/All Cases Asserted	09/21/2009	24877	Undetermined	Insufficient Documentation Claim
				TOTAL	\$6,611,047.94	

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

Debtors. : (Jointly Administered)

-----X

ORDER GRANTING DEBTORS' TWO HUNDRED FIFTH OMNIBUS OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)

Upon the two hundred fifth omnibus objection to claims, dated September 14, 2011 (the "Two Hundred Fifth Omnibus Objection to Claims"), of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the "Procedures Order"), to disallow and expunge the Insufficient Documentation Claims on the grounds that such claims failed to comply with the Bar Date Order's specific direction that claims include supporting documentation or an explanation as to why such documentation is unavailable, and, therefore, do not constitute valid prima facie claims, all as more fully described in the Two Hundred Fifth Omnibus Objection to Claims; and due and proper notice of the Two Hundred Fifth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Two Hundred Fifth Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Two Hundred Fifth Omnibus Objection to Claims

² Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Two Hundred Fifth Omnibus Objection to Claims.

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establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Two Hundred Fifth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the

Insufficient Documentation Claims are disallowed and expunged with prejudice; and it is further

ORDERED that this Order supersedes all previous orders regarding the

Insufficient Documentation Claims; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated:	, 2011	
New	v York, New York	
		UNITED STATES BANKRUPTCY JUDGE